IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION CASE NO. 5:13-cv-00721-FL

MARIAN SNOW,	
Plaintiff,	DEFENDANT GLOBAL CREDIT AND COLLECTION CORPORATION'S MEMORANDUM IN OPPOSITION TO PLAINTIFF'S REQUEST TO CLERK FOR ENTRY OF DEFAULT JUDGMENT
GLOBAL CREDIT AND COLLECTION CORPORATION; and GLOBAL INTERNATIONAL,	
Defendants)

Defendant Global Credit and Collection Corporation ("Global"), by and through its undersigned counsel, and appearing specially so as to preserve any and all defenses available under Fed. R. Civ. P. 12, hereby submits this Memorandum in Opposition to Plaintiff Marian Snow's (the "Plaintiff") Request to Clerk for Entry of Default Judgment (DE 16) (the "Request for Default Judgment"). In support of its Memorandum in Opposition to Plaintiff's Request for Default Judgment, Global relies on its Memorandum of Law in Support of Motion to Set Aside Entry of Default, filed contemporaneously herewith, and incorporated by reference herein.

As shown in Global's Memorandum of Law in Support of Motion to Set Aside Entry of Default, each of the six factors relevant to a Fed. R. Civ. P. 55(c) motion dictates setting aside the entry of default in this case. Thus, because "good cause" under Rule 55(c) exists for the Court to set aside the entry of default entered against Global on March 28, 2014, Plaintiff's Request for Default Judgment should be denied. As a result, Global respectfully requests that the Court deny Plaintiff's Request for Default Judgment, set aside the entry of default entered against Global on March 28, 2014, and permit Global to answer or otherwise respond to Plaintiff's Complaint within seven (7) days of the Court's Order.

Respectfully submitted,

s/William J. Long

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Attorney for Defendant GLOBAL CREDIT AND COLLECTION CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document via U.S. First Class Mail, on this the 22nd day of May, 2014:

Marian Snow 103 Nostalgia Ln Zebulon, North Carolina 27597

s/William J. Long
OF COUNSEL